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SONY COMPUTER ENTERTAINMENT
AMERICA, LLC*

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2 *Attorneys for Plaintiff Douglas Lodore
3 and the Putative Class*

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6
7 **UNITED STATES DISTRICT COURT**
8
9 **NORTHERN DISTRICT OF CALIFORNIA**
10
11 **SAN FRANCISCO DIVISION**

12 DOUGLAS LADORE, individually and on
13 behalf of all others similarly situated,

14 No. 3:14-CV-03530-EMC

15 *Plaintiff,*

16 **STIPULATION AND ~~PROPOSED~~
17 ORDER MODIFYING HEARING
18 DATE AND BRIEFING SCHEDULE
19 ON DEFENDANT'S MOTION TO
20 DISMISS**

21 *v.*

22 SONY COMPUTER ENTERTAINMENT
23 AMERICA, LLC, a Delaware limited
24 liability company,

25 Hon. Edward M. Chen

26 *Defendant.*

27 [Local Rule 6-2]

1 Pursuant to paragraph 4 of the Civil Standing Order for United States District Court Judge
2 Edward M. Chen and Northern District Local Rule 6-2, the Parties hereto, through their respective
3 counsel of record, stipulate as follows:

4 WHEREAS, Plaintiff Douglas Lodore (“Plaintiff”) filed his Class Action Complaint on
5 August 5, 2014 (Dkt. 1);

6 WHEREAS, Defendant Sony Computer Entertainment America, LLC (“Defendant”) filed
7 a Motion to Dismiss the Complaint, supporting Memorandum, and Request for Judicial Notice on
8 October 29, 2014 (Dkts. 30, 31);

9 WHEREAS, on November 3, 2014, the parties conferred and Plaintiff indicated that, due to
10 the availability of counsel, he requires additional time to prepare and file his responses to
11 Defendant’s Motion to Dismiss and Request for Judicial Notice. The parties also agreed that
12 scheduling issues pertaining to the upcoming Thanksgiving holiday necessitate further adjustments
13 to the briefing and hearing schedule on Defendant’s Motion to Dismiss and Request for Judicial
14 Notice;

15 WHEREAS, Plaintiff’s Opposition to Defendant’s Motion to Dismiss and Request for
16 Judicial Notice are presently due on November 12, 2014 and Defendant’s reply in support of its
17 Motion to Dismiss and Request for Judicial Notice is presently due on November 19, 2014 with a
18 hearing scheduled on December 11, 2014 at 1:30 pm before Judge Edward M. Chen in Courtroom
19 5 on the 17th Floor of the United States Courthouse located at 450 Golden Gate Avenue, San
20 Francisco, CA 94102;

21 WHEREAS, the parties stipulate and agree to move the hearing date to accommodate
22 modifications to the briefing schedule as follows:

23 **STIPULATION**

24 1. The parties, by and through their undersigned counsel, respectfully request that the
25 hearing on Defendant’s Motion to Dismiss be moved to December 18, 2014;

26 2. Plaintiff’s time in which to file his Opposition to Defendant’s Motion to Dismiss
27 and Request for Judicial Notice be extended to November 26, 2014 to give Plaintiff sufficient time

to fully consider and brief the issues raised by Defendant's Motion to Dismiss and Request for Judicial Notice.

3. Defendant's time in which to file its reply be extended to December 10, 2014 to accommodate scheduling conflicts and the Thanksgiving holiday.

4. The dates requested in this stipulation will not interfere with any dates previously set by order of the Court.

5. All parties agree to the stipulation as indicated by their signatures below. The parties respectfully request that the Court approve the stipulation, pursuant to Civil L.R. 6-2 and enter an Order thereupon. A Proposed Order is filed herewith.

Respectfully submitted,

EDELSON PC

Dated: November 7, 2014

By: /s/ Benjamin S. Thomassen

Benjamin S. Thomassen
Attorney for Plaintiff

SACKS, RICKETTS & CASE, LLP

Dated: November 7, 2014

By: /s/ Michele Floyd

Michele Floyd
Attorney for Defendant

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

Dated: November 7, 2014

/s/ Benjamin S. Thomassen
Benjamin S. Thomassen

[PROPOSED ORDER]

The Court, having considered the above joint request and good cause appearing therefore,
HEREBY ORDERS that:

The hearing of this matter will be held on December 18, 2014 at 1:30 p.m. Briefing shall proceed as follows:

Opposition: November 26, 2014;

8

Reply: December 10, 2014.

IT IS SO ORDERED. Case Management Conference is reset from Nov. 20, 2014 to December 18, 2014 at 1:30 p.m. Joint CMC Statement due December 11, 2014.

Dated: 11/10/14

~~HONORABLE EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE~~

